

MICHAEL J. SHEPARD (SBN 91281)
mshepard@kslaw.com

KING & SPALDING LLP

50 California Street, Suite 3300
San Francisco, California 94111
Telephone: +1 415 318 1221

CINDY A. DIAMOND (SBN 124995)
cindy@cadiamond.com

ATTORNEY AT LAW

58 West Portal Ave #350
San Francisco, CA 94127
Telephone: +1 408 981 6307

DAINEC P. STEFAN (admitted *pro hac vice*)
dstefan@kslaw.com

KING & SPALDING LLP

1185 Avenue of the Americas
34th Floor
New York, NY 10036
Telephone: +1 212 556 2291

Attorneys for Defendant
ROWLAND MARCUS ANDRADE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 3:2-cr-00249-RS

**DEFENDANT ROWLAND MARCUS
ANDRADE'S OPENING BRIEF
OBJECTING TO GOVERNMENT'S
PROPOSED FORFEITURE AND
RESTITUTION ORDERS**

ATTACHMENTS 1-22

Judge: Hon. Richard Seeborg, Chief Judge

1 The attachments to the Defendant's Opening Brief Objecting to the Government's Proposed
2 Forfeiture and Restitution Orders are appended to this filing.

3
4 Respectfully submitted,

5 DATED: August 22, 2025

KING & SPALDING LLP

6 By: /s/ Michael J. Shepard
7 MICHAEL J. SHEPARD
8 DAINEC P. STEFAN
9 CINDY A. DIAMOND

10 Attorneys for Defendant
11 ROWLAND MARCUS ANDRADE
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United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-1

WHIreland

CrossVerify Limited

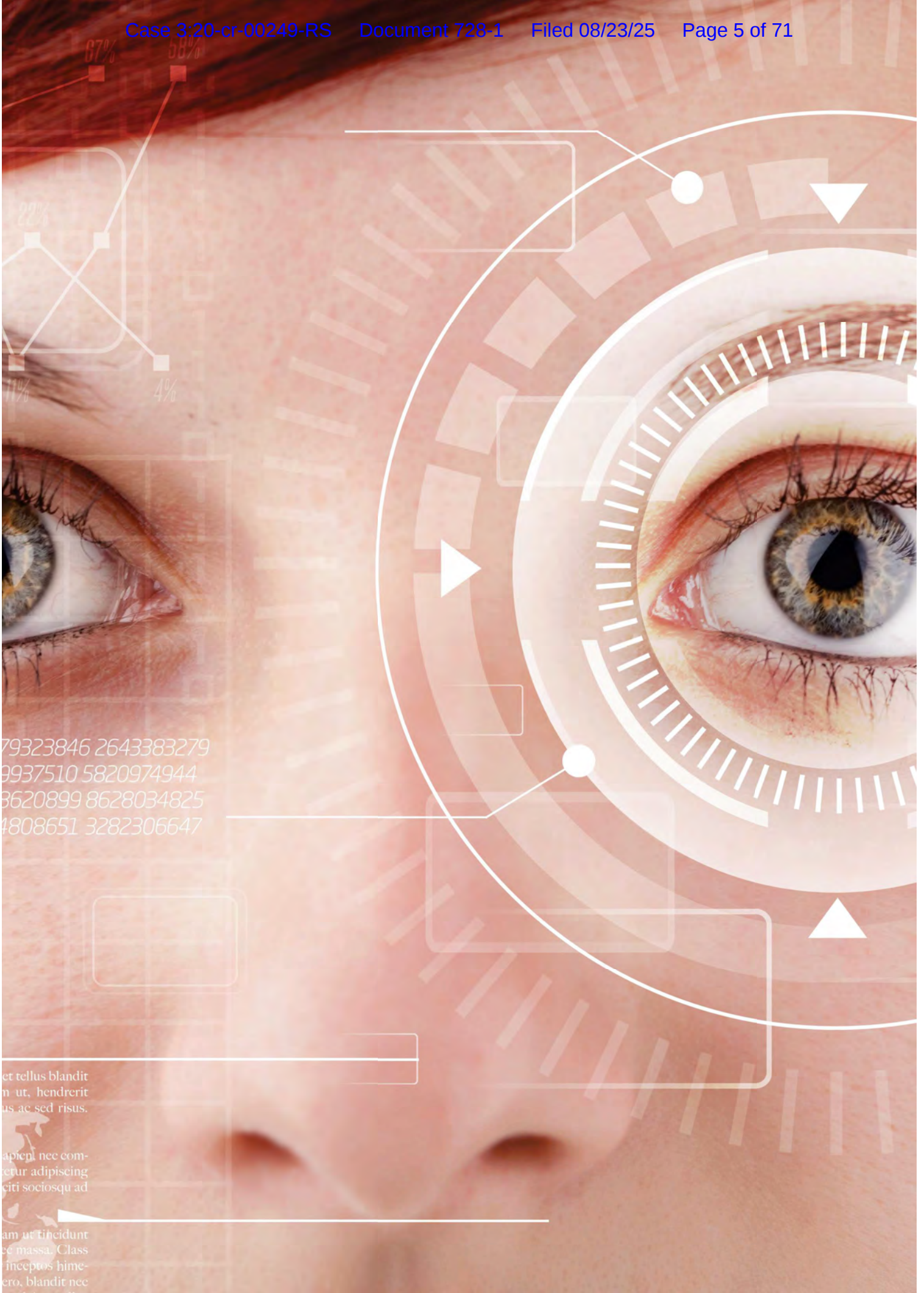


CrossVerify
— THE TRUST UTILITY —

Delivering verified KYC & AML through the Combination of
Biometric Authentication and Blockchain Technology.

A VCT/EIS Qualifying pre-IPO Investment Opportunity.

December 2016



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Introduction

The purpose of this document is to introduce you to CrossVerify Limited (“CrossVerify”), a biometric authentication company which is using proprietary blockchain technology to create a secure authentication utility to digitally store verified key personal information, including ‘Anti-Money Laundering’ (“AML”) and ‘Know Your Client’ (“KYC”) documentation, for access by appropriately permissioned CrossVerify corporate customers.

CrossVerify’s customers are able to load their clients’ verified key personal information, either in bulk or individually, into a secure blockchain environment, thereby enabling such clients to prove their identity to permissioned CrossVerify customers using biometric authentication on their mobile or personal devices.

The CrossVerify Utility complies with data privacy control and processing rules and, in the Directors’ opinion, enables CrossVerify customers to benefit from enhanced transparency, security, confidentiality and speed of deployment; cost savings; and new revenue opportunities.

The Directors believe that the delivery of verified KYC and AML documentation, through the combination of biometric authentication and blockchain technology, represents a highly disruptive and scalable solution.

The CrossVerify Utility was launched in December 2016 and already has [4] contracted customers, as well as a further [24] organisations which have indicated their intention to contract with CrossVerify. Its first significant revenue is expected to be generated by January 2017.

CrossVerify is looking to raise between £2-4 million in a VCT/EIS qualifying pre-IPO placing in early 2017, following proof of concept through revenue generation, ahead of a proposed AIM IPO in Q2 2017 to increase the overall fund raising to £10 million.

The proceeds from the pre-IPO fund raising will be used to finance further development of the CrossVerify Utility, including an iOS version of its Mobile App, and ongoing sales and business development, in addition to providing working capital for the short term growth of CrossVerify.

Background

CrossVerify provides *biometric authentication* in combination with *blockchain* technology to create a Utility which digitally stores verified key personal information, including AML and KYC documentation, for access by permissioned CrossVerify customers. This enables an individual's identity to be proved to the satisfaction of such customers.

Biometric authentication includes fingerprint, iris, retina, voice or face recognition using a personal or mobile device. Such authentication is increasingly replacing traditional user IDs and passwords, which are relatively easily compromised. In addition, by authenticating users biometrically on their own devices, CrossVerify removes the motivation for third parties to hack into central servers in search of confidential information.



A *blockchain*, which is also known as a distributed ledger, is a form of database which stores a number of records in a block, using a cryptographic public key algorithm to provide data integrity.

Blockchains can be used to share information with multiple users in the absence of control by any single entity, which facilitates the building of commercial relationships where information can be accessed or exchanged in a secure and cost-efficient manner.

“Banks are now racing to harness the power of the blockchain technology, in a belief that it could cut up to \$20bn off costs and transform the way the industry works.”

Financial Times, 1 November 2015

The Utility's integrity is assured by both the blockchain and biometric authentication features acting in concert.

“The use of a distributed ledger system, such as a blockchain, however, could unlock advantages by automating processes and thus reducing compliance errors. A blockchain-based registry would not only remove the duplication of effort in carrying out KYC checks, but the ledger would also enable encrypted updates to client details to be distributed to all banks in near real-time. In addition, the ledger would provide a historical record of all documents shared and compliance activities undertaken for each client.”

Deloitte 2016

The blockchain used by CrossVerify was initially developed by the Ethereum Foundation of Switzerland (<https://www.ethereum.org>), which now forms the basis of blockchains used by over 70 financial institutions. CrossVerify's Product Set

CrossVerify's product set principally comprises:

- the CrossVerify Blockchain Trust Utility (the "Trust Utility"), which is CrossVerify's blockchain. The Trust Utility works in tandem with both the CrossVerify Bulk Data Transfer Tool and the CrossVerify Mobile App to establish a secure point of digital storage for key personal data;
- the CrossVerify Bulk Data Transfer Tool, which provides the capability for its customers to bulk load into the Trust Utility copies of their clients' verified key personal records, thereby enabling such clients to prove their identity using the CrossVerify Mobile App on their own device; and
- the CrossVerify Mobile App, which enables Android users to prove their identity to any permissioned customer, using biometric authentication and therefore without the need for resubmitting AML or KYC documentation. The CrossVerify Mobile App can be white labelled to enable it to be provided with customer branding.

How It Works In Practice

ABC Bank, a customer of CrossVerify, digitally transfers copies of all of its clients' KYC and AML data onto the CrossVerify Utility using the CrossVerify Bulk Data Transfer Tool.

Each client of ABC Bank then receives an invitation from CrossVerify to provide five elements of unique biometric data to the CrossVerify Utility using their own device.

Thereafter, they can digitally prove their identity to ABC Bank by providing two pieces of biometric data via their device.

In addition to significantly reducing its KYC and AML costs ABC Bank can, where appropriately permissioned, either make available or generate revenue from its data stored on the CrossVerify Utility to other CrossVerify customers.



CrossVerify's Customer Base

CrossVerify believes that its offering is and will be of interest to many organisations including those who:

- might be at risk of fraud or identity loss due to inadequate customer authentication;
- wish to reduce their on-boarding and compliance costs;
- wish to enhance their procedures for proving the identity of their clients; and
- wish to cross-sell with other companies, whilst not giving up their client base.

Prior to launching its services in December 2016, CrossVerify had verbal indications of interest in its services from [29] potential customers, including Commercial and Central Banks, wealth managers, financial exchanges, insurance companies and other financial institutions, located in numerous countries.

[4] of these companies have signed user agreements with CrossVerify, including banking, insurance and security companies located in the US, UK, EMEA and UAE. Commercialisation

CrossVerify intends to provide its services to its customers on a software as a service basis, charging either (i) a fee of up to US \$1.00 per customer client access, or (ii) an annual licence fee.

The Market

Identity theft and cybercrime are becoming ever greater challenges to the global economy. It has been estimated that global annual cybercrime costs will grow by approximately 12 per cent per annum from US\$3 trillion in 2015 to US\$6 trillion in 2021.

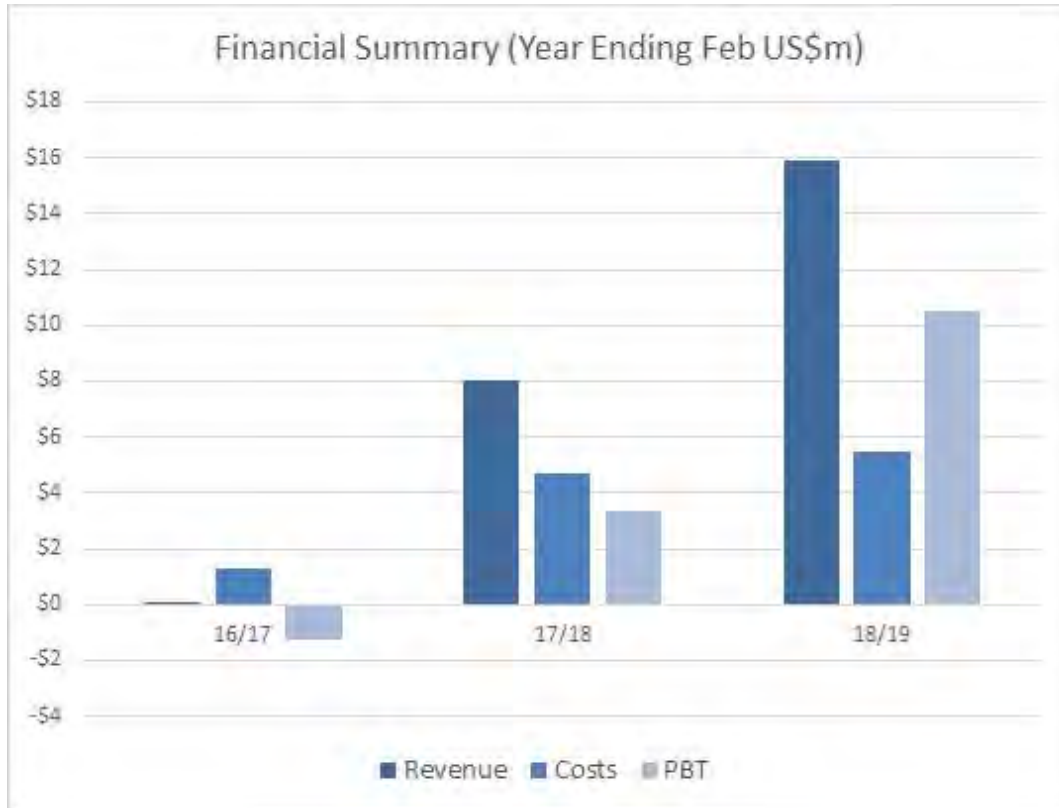
As a result, global spending on cyber security products and services to defend against such crime is projected to exceed US\$1 trillion over the period from 2017 to 2021 (Source: Cyber Security Ventures 2015). In the UK alone, fraud is now estimated to cost in excess of £192 billion each year (Source: Experian Fraud Indicator 2016).

The need for increased security and identity protection is becoming ever more important, which is reflected in the expected compound growth of the global biometric authentication and identification systems market by approximately 17 per cent per annum from 2015 to 2020 to US\$25 billion (Source: BIS Research 2015).



CrossVerify Financial Projections

In the projections below, CrossVerify has only taken into account, in the Directors' opinion, a conservative assessment of the accretion over time of licence or user fees tentatively agreed with each of the potential customers referred to in the section above entitled "CrossVerify's Customer Base". No income from any other potential customers has been taken into account.



Intellectual Property

The CrossVerify Utility has been developed around the Ethereum open source blockchain technology by three teams of contracted software specialists.

CrossVerify has two US patents pending in respect of its Utility, No. 15/083,241 entitled "Systems and methods for providing blockchain-based multifactor personal identity verification", and No. 15/335,344 entitled "Systems and methods for providing a universal decentralized solution for verification of users with cross-verification features".

Competition

CrossVerify is not aware of any other organisation in any location which stores verified KYC and AML documentation in a secure environment using biometric authentication in conjunction with blockchain technology.

Board of Directors

Jim Milby – Non-Executive Chairman

Jim is currently a senior adviser to McKinsey and Co and International Finance Corporation, a Board Member of Uphold Inc., a Trustee of Lynn University and a mentor of Startupbootcamp. He was previously Co-Head of Barclays Global Operations and a Senior Vice President at Citi.

Carl Weir – CEO

Carl was, until June 2016, VP, EMEA Partnering and Business Development at Uphold Inc.. Prior to Uphold, Carl held senior positions within the financial community in Global Tier 1 institutions in EMEA, including Senior Vice President, Business Development Marco Polo New World and EMEA Head of Cross Asset FIX Connectivity for HSBC Global Banking & Markets. Carl also sat on the Global Steering Committee of FIX Protocol Ltd and co-chaired its Global Cross Asset Committee.

Andy Francombe – CFO

Andy is a big four trained Chartered Accountant who has held senior finance roles at The Coca-Cola Company, Conran Restaurants and Macquarie Bank. In addition to being CrossVerify CFO, Andy is also CFO of PCI-PAL Plc, an AIM quoted, card payment solutions FinTech business, and a Trustee of The Coca-Cola Company's UK Pension Scheme.

Hirander Misra – Non-Executive Director

Hirander is CEO & co-founder of Global Markets Exchange Group International, a group of companies that offer ethical, sustainable and innovative solutions for the new age of global financial markets. Hirander is also Non-Executive Chairman & co-founder of Forum Trading Solutions Ltd, a Non-Executive Director of Avenir Technology Ltd, a Director & co-founder of Global Reporting Company Ltd. Hirander was previously the COO and co-founder of Chi-X Europe Limited which was sold to BATS Global.

Charles Carvosso – Non-Executive Director

Charles is currently a Senior Consultant at Allegiance Insurance Ltd, an independently owned, niche insurance broker, and is CEO of Fidex Global Ltd, a specialist business development and consultancy firm. Charles was previously an executive at Towergate Insurance and BMS Group.

Paul Henderson – Non-Executive Director

Paul is an investor and adviser with a focus on frontier markets and disruptive technologies, disintermediation and data aggregation. He is currently founder and commercial director of Logik Communications, a growing alternative telecoms carrier boutique with an established VOIP backbone covering the USA, UK, CIS and EMEA regions. He is also principal and founder of Optionality which provides commercial and business development, corporate finance and structuring and capital raising consultancy services.

Randy Wooten – Non-Executive Director

Randy earned his law degree from the University of Houston in 1981. He began his career practising general civil law. Thereafter, he spent ten years practising with a small plaintiff's firm, prior to opening his own firm in 1992. He has more than 35 years of experience in civil law including the handling of complex litigation representing both the plaintiff and defendant. He represents Fintech Fund Family Limited Partnership, the principal shareholder of CrossVerify.

Employees and Operations

CrossVerify has sub-contracted the development of its platform to teams of software specialists located in the case of (i) web design and the verification server in India, (ii) the Mobile App in Dubai and (iii) the Trust Utility in Belarus.

Principal Shareholder

The principal shareholder of CrossVerify is Fintech Fund Family Limited Partnership, which holds approximately 75% of CrossVerify's issued share capital.

Disclaimer

This Information Memorandum (the “Memorandum”), which is issued by WH Ireland Limited (“WHI”) on behalf of the directors and shareholders of CrossVerify Limited, is for the exclusive use of the persons to whom it is addressed and their advisers in connection with the proposed capital raising by CrossVerify Limited (“CrossVerify” or the “Company”). It is being made available for information purposes only with a view to assisting the recipient in determining its interest in CrossVerify and in deciding whether it wishes to proceed thereafter with confirmatory due diligence.

This Memorandum is strictly private and confidential. It, and any further information or opinions made available to you, must be held in complete confidence. It must not be copied, reproduced, distributed or passed, in whole or in part, to any other person at any time without the prior written consent of WHI. By accepting a copy of this Memorandum, the recipient agrees not to approach the Company or any of its officers, employees, agents, suppliers or customers without the prior consent of WHI.

This Memorandum does not constitute an offer or invitation or a solicitation of any offer or invitation for securities. It is not intended to form the basis of or act as an inducement to enter into any contract or investment activity, and should not be considered as a recommendation by WHI or any other person in relation to the Company.

The information in this Memorandum, which does not purport to be comprehensive, has been provided to WHI by the Company and/or has otherwise been obtained from publicly available sources. The information in this Memorandum has not been verified by WHI, the Company or any other person. No representation or warranty, express or implied, is or will be given by the Company, WHI or their respective directors, officers, employees or advisers or any other person as to the accuracy or completeness of this Memorandum and, so far as permitted by law, no responsibility or liability is accepted for the accuracy or sufficiency thereof, or for any errors, omissions or misstatements, negligent or otherwise, relating thereto. In particular, but without limitation, (subject as aforesaid) no representation or warranty, express or implied, is given as to the achievement or reasonableness of, and no reliance should be placed on, any projections, targets, estimates or forecasts and nothing in this Memorandum is or should be relied on as a promise or representation as to the future. Accordingly, (subject as aforesaid) neither the Company nor WHI, nor any of their respective directors, officers, employees or advisers, nor any other person, shall be liable for any direct, indirect or consequential loss or damage suffered by any person as a result of relying on any statement in or omission from this Memorandum or any other written or oral communication with the recipient or its advisers in connection with its evaluation of the Company and (save in the case of fraudulent misrepresentation or wilful non-disclosure) any such liability is expressly disclaimed.

Any prospective investor in the Company will be required to acknowledge that it has not relied upon or been induced to enter into such contract or to make such offer by any representation or statement contained herein. In all cases, interested parties should conduct their own investigation and analysis of the Company and of the data contained in this Memorandum.

In furnishing this Memorandum, neither the Company nor WHI undertakes any obligation to provide any additional information or to update this Memorandum or to correct any inaccuracies that may become apparent. The Company and WHI reserve the right to negotiate with one or more prospective investors at any time and to enter into a definitive investment agreement without prior notice to other prospective investors and without liability to any prospective investors. The Company and WHI also reserve the right, without advance notice, to change the procedure for the capital raising by the Company or to terminate negotiations at any time prior to entering into any binding contract for the investment in the Company. In no circumstances will the Company or WHI be responsible for any costs or expenses incurred by any recipient in connection with any investigation or evaluation of the Company or for any other costs or expenses incurred by any person in connection with the proposed capital raising by the Company.

The receipt of this Memorandum by any person is not to be taken as constituting the giving of investment advice by WHI to any such person, nor to constitute such person a client of WHI. WHI is acting as adviser to the Company and no one else in connection with the capital raising by the Company and will not be offering advice or otherwise be responsible to any person other than the Company.

This Memorandum is only being made available to investment professionals (as defined in Article 19(5) of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005 (“FPO”)) and persons of a kind specified in Article 49(2) a-d of the FPO (high net worth companies, unincorporated associations etc.)

*At your
service*

Chris Fielding

Head of Corporate Finance, WHIreland

T +44 (0)20 7220 1650

M +44 (0)7775 785905

Nick Prowting

Corporate Finance Manager, WHIreland

T +44 (0)20 7220 1691

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-2



Companies House

TM01 (ef)

Termination of a Director Appointment

Company Name: **CROSSVERIFY LTD**

Company Number: **10025371**



Received for filing in Electronic Format on the: **15/12/2016**

XSLXACKH

Termination Details

Date of termination: **07/12/2016**

Name: **ROWLAND MARCUS ANDRADE**

Authorisation

Authenticated

This form was authorised by one of the following:

Director, Secretary, Person Authorised, Liquidator, Administrator, Administrative Receiver, Receiver, Receiver manager, Charity Commission Receiver and Manager, CIC Manager, Judicial Factor.



United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-3



Marcus Andrade <ceo@amlbitcoin.com>

Weekly Management Update - 14th August 2018

2 messages

Mikail [REDACTED]@dit.network>
To: All Staff <allstaff@dit.network>

Wed, Aug 15, 2018 at 3:40 AM

Date	14Aug2018	16:00-16:30
Location	23 Austin Friars, London	
Subject	Weekly Management Update	
Minutes Author	Mikail Conybeare [MC]	
Present	David [REDACTED] [DO], Mikail [REDACTED] [MC], Nigel C [REDACTED] [NQ], Warren C [REDACTED] [WC]	
Online	John C [REDACTED] [JC], Raymond F [REDACTED] [RR], Richard N [REDACTED] [RN]	
Distribution	Angela K [REDACTED] [AK], Bill G [REDACTED] [BG], Marcus Andrade [MA], Simon C [REDACTED] [SC], Terence F [REDACTED] [TP]	

Issue	By	Update	Owner	Action Date
Negotiation				
Panama Ship Registry	RN	RN pursuing new angle with somebody else who has connections to the ship registry.	RN	Aug2018
Meeting Held				
Alastair Lukies	RR	Meeting dates in early October offered now (details below), awaiting responses.	RR	Aug2018
Citigroup	MC	Sales team to initiate follow up with retail side.	NQ	Sep2018
EY	RR	No response yet, RR to chase	RR	21Aug2018

EX2033-001

		tomorrow if no response.		
Mediolanum	NQ	Nigel to chase once we have firmer partner progress in order to entice Mediolanum.	NQ	Aug2018
FCA	NQ	Good call with FCA Direct Support done on 9 th August. Follow up to demo 2.0 to Direct Support team. NQ to follow up to arrange date for demo and send initial regulatory questions now.	NQ	21Aug2018
All-Party Parliamentary Taxation Group	RR	Now in Recess, back at the beginning of October.	RR	Oct2018
CISI	RR	Meeting with George L [REDACTED] put back to week after next. October meeting date proposed now and is fine. Awaiting date options from George.	RR	Aug2018
Qualification				
Motive Partners	RR	Meeting dates pushed back to first week of October due to Summer holidays.	RR	Aug2018
Credit Suisse	NQ	Still waiting for response, NQ to chase.	NQ	21Aug2018
GBX	RR	COO and CFO now identified and due to start end of August, GBX keen to get ball rolling. Now offered first week of October meeting date. FCA Sandbox partnership proposed.	RR	Aug2018
Jersey	RR	RR to arrange follow up call with RN NQ.	RR	Aug2018
Sri Lanka	RR	Offered October date now, awaiting response.	RR	Aug2018
Kazakhstan FC	RR	On hold		
OECD	RR	RR sent through conference link. OECD conference in Paris 4 th week September looks valuable to attend. FATF off for time being.	RR	Aug2018
Port of Dover	RR	October meeting dates now offered.	RR	Aug2018

EX2033-002

Prisa Group	RN	No response back yet.	RN	Aug2018
Royal Mint	RR	Tied up with EY.		
TransferWise	NQ	Early September meeting date offered.	NQ	Aug2018
Uphold	RN	RN conference call with them 15 th August.	RN	21Aug2018
Leads				
Barclays	RR	Interested in meeting, date options in October being proposed.	RR	Aug2018
Crypto Compliance	RN	Demo call to be arranged for app 2.0.	RN	21Aug2018
Lloyds of London	RR	No update from last week.	RR	Aug2018
Coventry Building Society	RR	Offered early October meeting date, awaiting response.	RR	Aug2018
Link	RR	Offered early October meeting date, awaiting response.	RR	Aug2018
UK Dept of Culture, Media and Sport	RR	Not a priority at the moment.	RR	Aug2018
Applied Blockchain	RN	Still no response, lead to be closed.	RN	Aug2018
Viagogo	NQ	Potential lead recommended from Alastair L meeting as they have a need for identity solution for event ticket sales. To be followed up by London sales team.	NQ	Sep2018
Diligex	NQ	NQ had call with them. Follow up technical call arranged with a view to arrange a commercial meeting if successful.	NQ	21Aug2018
Liberia	RN	RN to follow up. French translation required for flyers, NQ to arrange.	RN	Sep2018
Sierra Leone	RN	RN to follow up.	RN	Sep2018
Somalia	RN	RN to follow up.	RN	Sep2018

EX2033-003

Product Management
<ul style="list-style-type: none"> • Sonin admin website GUI finished, API integration in progress. • MVP mobile app GUI work in progress in parallel. • Latest Product Roadmap available here: https://bit.ly/2NvhHVt • ABTC – HIT BTC confirmed that ABTC will be listed on exchange, tentative timeframe given was roughly 3 weeks (mid-to-late August).
Partners
<ul style="list-style-type: none"> • R3 –MC and NQ to meet with Abbas 15th August. • Blockchain Finance Conference Dublin – NQ spoke to Dean Murphy, flexible on pricing. Decision to be made to do Dublin, CordaCon, or both. • Aware – No update from last week. • Infosys – Amended NDA sent back, NQ to review.
Finance
<ul style="list-style-type: none"> • Natwest bank account setup still in progress – No update from last week.
Recruitment
<ul style="list-style-type: none"> • Delay to Nathan's start date due to issue with previous employer. Expected start date now 3rd September. • Formal offer made to loan Troana (developer). Still awaiting signed offer letter. • London Sales Team - Meeting held on 10th August. Documentation received, success metrics discussed. 3-5 R3 members agreeing to be involved in an R3 project. Early September start date.
Website
<ul style="list-style-type: none"> • dit.network website to be updated with more content once MVP mobile app designs are finalised this week.

Richard N. [REDACTED] <[REDACTED]@dit.network>

Thu, Aug 16, 2018 at 1:23 AM

To: Marcus Andrade <ceo@amlbitcoin.com>, Jack Abramoff <jack@abramoff.com>

Summary:

- Summer is a tough time for BD;
- Product side is looking good;
- V1.02, First Corda product rollout, hopefully by the end of the month;
- Website suited for initial sales will be ready for the end of the month and product completion;

EX2033-004

- Budget – we are so far in way below budget;, we are now in at app. 575K for the project until now, will be in at a little over USD 650k by the rollout of the first version, as compared to the initial budget of GBP 750K which is app, \$875k; and that includes Halogen for the last 5 months which were not originally part of the project budget.
- The flip side of that is that due to the budget constraints, I have pushed off non critical costs and HR a little, but we will have to catch up eventually on QC and other aspects. Plus we will need to start marketing and dedicate a budget to that. I have the two senior people that we discussed, coming in Sept 1 st on a part time basis, and we will need funds for Corda conference on Sept. 12-13 and Dublin Fintech Oct. 2-3, if we want to have an effective exit of stealth mode.

Yes, we do need additional funds to get this going right, but my point is not to frustrate you about it, rather for you to have confidence in that once we do get the funds, they will be efficiently deployed and I hope, have a meaningful effect, both in the form of a generating a sales cycle in DIT, and in the form of generating PR and value to the ABTC.

[Quoted text hidden]

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-4



Marcus Andrade <ceo@amlbitcoin.com>

Weekly Management Update - 24th July 2018

3 messages

Mikail C [REDACTED] <[REDACTED]@dit.network>
To: All Staff <allstaff@dit.network>

Tue, Jul 24, 2018 at 12:08 PM

Date	24Jul2018	12:00-12:30
Location	23 Austin Friars, London	
Subject	Weekly Management Update	
Minutes Author	Mikail C [REDACTED] [MC]	
Present	David C [REDACTED] [DO], Mikail C [REDACTED] [MC], Warren C [REDACTED] [WC]	
Online	Nigel C [REDACTED] [NQ], , Raymond F [REDACTED] [RR], Richard N [REDACTED] [RN]	
Distribution	Angela K [REDACTED] [AK], Bill [REDACTED] [BG], John [REDACTED] [JC], John [REDACTED] [JL], Marcus Andrade [MA], Simon C [REDACTED] [SC], Terence H [REDACTED] [TP]	

Issue	By	Update	Owner	Action Date
Negotiation				
Panama Ship Registry	RN	Last email received from them indicated they were deliberating whether registry or government should do project. Much longer process to be expected if they decide government. Update expected in August.	RN	Aug2018
Meeting Held				
Alastair Lukies	RR	RR and RN looking to spend a week in London in early Sept to meet with Motive and other prospects with a potential additional week in early October if needed.	RR	27Jul2018
Citigroup	MC	Sales team to initiate follow up with retail side.	NQ	Aug2018

EX2027-001

EY	RR	Response to meeting with next steps expected by end of this week. To be chased if nothing received.	RR	27Jul2018
Mediolanum	NQ	Nigel to chase.	NQ	27Jul2018
FCA Sandbox	NQ	*Post call update: Application for FCA 'Direct Support' scheme to be submitted this week.	NQ	27Jul2018
All-Party Parliamentary Taxation Group	RR	RR following up on potential legislative changes.	RR	Aug2018
CISI	RR	George L [REDACTED] looking to meet RR in Edinburgh in early August. Due to busy September schedule, October now preferable for the educational session.	RR	Aug2018
Qualification				
Motive Partners	RR	Looking to arrange meeting in early September with early October a backup date.	RR	Aug2018
Credit Suisse	MC	Call arranged with NQ, MC, and Emmanuel A [REDACTED] (Head of DLT and blockchain) for 26 th July.	NQ	26Jul2018
GBX	RR	New COO still settling in, looking to arrange a meeting for September.	RR	Sept2018
Jersey	RR	Briefing and presentation to Geoff C [REDACTED], CEO, Jersey Finance and the Jersey Finance Minister. To be arranged for Jersey in September.	RR	Aug2018
Sri Lanka	RR	Briefing and presentation to Mangala S [REDACTED], Sri Lankan Finance Minister regarding the Sri Lankan International Financial Centre to be arranged for September in London.	RR	Aug2018
Kazakhstan FC	RR	On hold		
FATF	RR /NQ	Publication released that contradicted previous discussions with FATF. Phone call set up with David [REDACTED]	RR	03Aug2018

EX2027-002

		with next steps to be decided after. NQ has reached out to Mark W [REDACTED] at the Anti-Corruption Commission in Cayman.		
Port of Dover	RR	PoD looking to arrange a joint meeting with Calais.	RR	Aug2018
Prisa Group	RN	Richard following up on proposal.	RN	31Jul2018
Royal Mint	RR	Tied up with EY.		
TransferWise	RN	RN met with Yoni who is happy to make introductions and start process of kicking off a project, but timelines after this would not be immediate as project lead on their side has just joined and this wouldn't be initial priority.	RN	Aug2018
Uphold	RN	RN looking to arrange a call with them this week.	RN	31Jul2018
Leads				
Lloyds of London	RR	*Post call update from RR - As an in to UK insurance.	RR	Aug2018
Coventry Building Society	RR	*Post call update from RR - Potential lead recommended by Alastair L [REDACTED]	RR	Aug2018
Link	RR	Recommended by Alastair L [REDACTED] to arrange meeting.	RR	Aug2018
UK Dept of Culture, Media and Sport	RR	*Post call update from RR - Liam M [REDACTED], UK Govt's National Technology Advisor	RR	Aug2018
Applied Blockchain	RN	Potential for co-operation, to be explored.	RN	Aug2018
Viagogo	NQ	Potential lead recommended from Alastair L [REDACTED] meeting as they have a need for identity solution for event ticket sales. To be followed up.	NQ	Aug2018
Diligex	NQ	NQ to follow up.	NQ	25Jul2018
Liberia	RN	RN to follow up.	RN	Sep2018
Sierra Leone	RN	RN to follow up.	RN	Sep2018

EX2027-003

Somalia	RN	RN to follow up.	RN	Sep2018
Illinois Government	RN	Source of info: https://sites.google.com/view/blockchain-govt-tracker		

Product Management

- Sonin admin website development scope signed-off after meeting with BG today to clarify some open ends. Technical kick off call taking place today.
- Mobile app MVP wireframes now being finalised to be sent to Sonin for quote.
- Corda integration Ongoing.
- Latest Product Roadmap available here: <https://bit.ly/2NvhHVt>
- ABTC – HIT BTC confirmed that ABTC will be listed on exchange, tentative timeframe roughly 3 weeks. The plan is for a PR splash to announce listing that also mentions CrossVerify being part of the FCA Direct Support scheme (dependant on FCA confirming inclusion, which looks likely from previous meeting).

Partners

- R3 – Showcase call to take place in August / September to allow time to find a partner to present with as this will add significant value to bring on additional partners.
- Aware – Expressed a strong interest to partner for sales and could potentially help drive partner sales channel in Brazil as they have an established client there. To be followed up.
- FCA – *Post call update: Direct Support application to be submitted this week.

Finance

- Need to arrange further call between JL, SC, and NQ in order to determine cost forecast which will be driven by the revenue forecast.
- Temporary company bank account opened with Transferwise. Natwest bank account setup still in progress and waiting on Natwest. Escalated by NQ again.

Recruitment

- QA Lead Nathan joining on 1st August. *Post call update: Delay to Nathan's start date due to issue with previous employer, now likely w/c 6th August at earliest.
- NQ to send RN Sales team proposal.
- Job Description for a Junior Copywriter / Researcher being put together by MC.

Website

- Once priority MVP work for admin website and mobile is complete, the dit.network website will be updated with more content.

Staff Holidays

- Nigel C [REDACTED] – 23rd July to 3rd August.
- Warren C [REDACTED] – 27th July to 3rd August.

EX2027-004

Marcus Andrade <ceo@amlbitcoin.com>

Tue, Jul 24, 2018 at 12:22 PM

To: Jack Abramoff <jack@abramoff.com>, Richard [REDACTED] <[REDACTED]@dit.network>

Until we find out what happens when Langdon please remove him from these updates.

This is privileged information.

Thanks

Marcus

[Quoted text hidden]

Marcus Andrade <ceo@amlbitcoin.com>

Tue, Jul 24, 2018 at 3:01 PM

To: David Mata <dbmata@gmail.com>

CONFIDENTIAL

DO NOT SHARE THIS INFORMATION. DO NOT EVEN SHARE WITH ANY POTENTIAL BUYERS OF THE COIN.

----- Forwarded message -----

From: **Mikhail C** [REDACTED] <[REDACTED]@dit.network>

Date: Tue, Jul 24, 2018 at 12:08 PM

Subject: Weekly Management Update - 24th July 2018

To: All Staff <allstaff@dit.network>

[Quoted text hidden]

--

Marcus Andrade, Founder
NAC Foundation, LLC
7495 W. Azure Drive, Suite 110
Las Vegas, Nevada 89130
Office: 1-702-515-4038

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-5

Subject: Re: LSE Update
From: Richard <[REDACTED]>
Sent: Wed 4/4/2018 3:19:44 PM (UTC-05:00)
To: "Raymond R [REDACTED]" <[REDACTED]@halogencom.com>
Cc: <ceo@amlbitcoin.com>, "Jack Abramoff" <jack@abramoff.com>, "John C [REDACTED]" <john@halogencom.com>

Case 3:20-cr-00249-RS Document 728-1 Filed 08/23/25 Page 31 of 71
EX2193-001

Looking good!

Best Regards,
Richard

(Sent via mobile, please disregard any typos)

----- Original message -----

From: Raymond R [REDACTED] <[REDACTED]@halogencom.com>
Date: 4/4/18 23:07 (GMT+02:00)
To: Richard <[REDACTED]>
Cc: ceo@amlbitcoin.com, Jack Abramoff <jack@abramoff.com>, John C [REDACTED] <john@halogencom.com>
Subject: LSE Update

Hi Richard,

As agreed last week in London, Angela followed up our meeting with the LSE by meeting Antonella for feedback and to discuss next steps. Things are looking very positive. It appears that two options (not mutually exclusive are emerging):

Firstly, Chris C [REDACTED] has indicated to her that he was very impressed and is very interested in CrossVerify and is minded to take things forward. We now have to negotiate exactly what - it could be to take forward the pilot project we have talked about previously; or something more substantial along the lines of a formal Joint Venture - Angela indicated our willingness to discuss this saying that this would have the benefit of both bringing something to the table - LSE bringing money and clients; NAC bringing CrossVerify and innovation.

Secondly, the possibility of a UKFCA Sandbox trial of a digital financial instrument that the LSE clients were interested in, with the AML CrossVerify platform on the front. For us that would have the benefits of halving the costs and doubling the credibility. For the LSE it gets them on the FinTech front foot and fits absolutely four square into what Nicholas B [REDACTED] was on about when we saw him at the LSE in February and he talked about digitalising and digital coins.

Angela concluded the conversation agreeing that Antonella would have an internal heads up with Chris C, explain how a combined Sandbox trial could work and get him to think more about what he wanted to propose by way of co-operation/possible JV, and Angela meanwhile would report back and discuss.

She hasn't committed us to anything other than confirming our desire to collaborate in a meaningful way with the LSE.

Finally, Angela has agreed to speak to Martin W [REDACTED] next week and has advised him that there has been a development that she would like to touch base with him about ie checking out the Royal Mint to see if would they be up for a joint UK FCA Sandbox trial with us or with us and the LSE.

This is all incredibly exciting and has enormous potential - however, given the players everything will need to be handled carefully and sensitively and, for the moment, in strictest confidence. You need to trust us to manage the process this end - so apologies in advance if we nag and appear to do things in a very British way which, to non-Brits, can appear frustrating.....

Raymond R [REDACTED]
Director of Public Affairs

<image001.png> Halogen Communications
Don't forget to check out our new website!

UK

[REDACTED]
Edinburgh, [REDACTED]
[REDACTED]

USA

Evening Star Building, 6th Floor,
[REDACTED],
Washington, D.C.
[REDACTED]



Help the environment. Please don't print this e-mail unless you really need to.

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-6



Marcus Andrade [REDACTED]

ICOBx services for AMLBitcoin

26 messages

Sergei Motov [REDACTED]

Wed, Oct 11, 2017 at 6:44 PM

To: [REDACTED]

Cc: Vladimir Sofronov [REDACTED]

Dear Marcus,

we've sent NDA and services agreement via docusign to your email.

Here is our digital wallets:

for BTC - 15shSw1ioGyKofjxxPFiWoQkZHMvSuJDVK

for ETH - 0xaDDba13aD0fa5D7A82b40763Aa02575CA60540c9

Best regards,

Sergei Motov

ICOBx | Legal Counsel

Marcus Andrade [REDACTED]

Wed, Oct 11, 2017 at 6:51 PM

To: Sergei Motov [REDACTED]

Cc: Vladimir Sofronov [REDACTED] >, Japheth Dillman [REDACTED]

Hello Serge,

There was a slight correction in the payment.

I am supposed to pay 100K = (365 ETH)

Then I should be paying 7 BTC and not 3 BTC

The remaining 3 BTC owed will be paid by issuing an additional 49 ETH.

So the total initial payment should be 7 BTC and 413 ETH.

Please confirm. Let me know if I should just sign the agreement as is or if you want to make the slight change.

Thank you,

Marcus

[Quoted text hidden]

--

Marcus Andrade, Founder
NAC Foundation, LLC**Marcus Andrade** [REDACTED]

Wed, Oct 11, 2017 at 6:56 PM

To: jackabramoff [REDACTED]

[Quoted text hidden]

Vladimir Sofronov

To: Marcus Andrade

Cc: Sergei Motov Japheth Dillman <

Wed, Oct 11, 2017 at 6:58 PM

Hi Marcus!

Got it, we thought that you want to pay 3BTC, not 7.

By the way the current exchange rate for eth is 300, so 100 000usd is 333 in ETH.

We will correct the contract and send it to you shortly.

[Quoted text hidden]

Japheth Dillman <jdillman@clevrplay.com>

To: Vladimir Sofronov

Cc: Marcus Andrade Sergei Motov

Wed, Oct 11, 2017 at 7:01 PM

Thank you everyone

Sent from my iPhone

[Quoted text hidden]

Marcus Andrade

To: jackabramo

Wed, Oct 11, 2017 at 7:03 PM

----- Forwarded message -----

From: **Vladimir Sofronov** <

Date: Wed, Oct 11, 2017 at 6:58 PM

Subject: Re: ICOBox services for AMLBitcoin

[Quoted text hidden]

[Quoted text hidden]

Sergei Motov <sm@icobox.io>

To: Marcus Andrade

Cc: Vladimir Sofronov Japheth Dillman

Wed, Oct 11, 2017 at 7:07 PM

Dear Marcus,

based on exchange rate set by Kraken 100k USD equal to 333 ETH and 3 BTC are equal to 52 ETH, so initial payment should be 385 EHT plus 3 BTC.

Please confirm calculation and if it's ok I'll resend an agreement.

Best regards,
Sergei

[Quoted text hidden]

Marcus Andrade

To: Sergei Motov

Cc: Vladimir Sofronov Japheth Dillman

Wed, Oct 11, 2017 at 7:14 PM

Hello Sergei,

Hello Sergei, what you are saying is a total of 385 ETH and 7 BTC's.?

Also for the 3 BTC's please let me know what conversation rate your using.

Best,

Marcus

[Quoted text hidden]

Sergei Motov

Wed, Oct 11, 2017 at 7:18 PM

To: Marcus Andrade <

Cc: Vladimir Sofronov < Japheth Dillman

Dear Marcus,

we're using exchange rate on Kraken (<https://www.kraken.com/charts>), regarding 3 btc - it's my fault. Yes, initial payment in amount of 385 ETH and 7 BTC.

Best regards,
Sergei

[Quoted text hidden]

Marcus Andrade <ceo@amlbitcoin.com>

Wed, Oct 11, 2017 at 7:19 PM

To: Sergei Motov

Cc: Vladimir Sofronov Japheth Dillman

All Good.

Thank you Sergei

Marcus

[Quoted text hidden]

Sergei Motov <sm@icobox.io>

Wed, Oct 11, 2017 at 7:21 PM

To: Marcus Andrade

Cc: Vladimir Sofronov Japheth Dillman

Ok, great, I'll resend you documents.

Best regards,
Sergei

[Quoted text hidden]

Vladimir Sofronov

Wed, Oct 11, 2017 at 7:38 PM

To: Marcus Andrade

Cc: Sergei Motov Japheth Dillman

Great! We see you signed the documents.

Now as a next step we need a technical contact from your team, someone with whom we can talk about deployment of our Bookbuilding platform and also people with whom we should communicate on PR and marketing side.

Vlad.

[Quoted text hidden]

Marcus Andrade <

Wed, Oct 11, 2017 at 7:38 PM

To: Sergei Motov

Cc: Japheth Dillman

Please confirm the payment address below.

for BTC - 15shSw1ioGyKofjxxPFiWoQkZHMvSuJDVK

for ETH - 0xaDDba13aD0fa5D7A82b40763Aa02575CA60540c9

On Wed, Oct 11, 2017 at 6:44 PM, Sergei Motov <[REDACTED]> wrote:

[Quoted text hidden]

[Quoted text hidden]

Sergei Motov <[REDACTED]>

Wed, Oct 11, 2017 at 7:41 PM

To: Marcus Andrade <[REDACTED]>

Cc: Japheth Dillman <[REDACTED]>, Vladimir Sofronov <[REDACTED]>

Addresses confirmed.

Best regards,
Sergei

[Quoted text hidden]

Marcus Andrade <[REDACTED]>

Wed, Oct 11, 2017 at 7:43 PM

To: Vladimir Sofronov <[REDACTED]>

Cc: Sergei Motov <[REDACTED]>, Japheth Dillman <[REDACTED]>, Hung Tran <[REDACTED]>

Jamie McCormick <[REDACTED]>, Erwin Doornbos <[REDACTED]>

<[REDACTED]>, Lisa Helfer <[REDACTED]>

Hello Vlad,

When it comes to the deployment of the platform, please get with Hung.

Everyone else I included on this email will also assist your team in anything you need done.

Thank you,

Marcus

[Quoted text hidden]

Marcus Andrade <[REDACTED]>

Wed, Oct 11, 2017 at 7:47 PM

To: Sergei Motov <[REDACTED]>

Cc: Japheth Dillman <[REDACTED]>, Vladimir Sofronov <[REDACTED]>

Great. Just sent you 7 BTC's. The ETH will follow by morning.

Thank you,

Marcus

[Quoted text hidden]

Vladimir Sofronov <[REDACTED]>

Wed, Oct 11, 2017 at 7:48 PM

To: Marcus Andrade <[REDACTED]>

Cc: Sergei Motov <[REDACTED]>, Japheth Dillman <[REDACTED]>, Hung Tran <[REDACTED]>

Jamie McCormick <[REDACTED]>, Erwin Doornbos <[REDACTED]>

<[REDACTED]>, Lisa Helfer <[REDACTED]>, Daria Generalova <[REDACTED]>

Looping in Daria Generalova, she would be handling PR and marketing from our side.

Hi Hung! Is there any other way contacting you other than e-mail? Do you use telegram? It would be super convenient for us to use telegram for communicating on the deployment of the bookbinding platform(payment system)

Vlad

[Quoted text hidden]

Japheth Dillman <jdillman@clevrplay.com>

Wed, Oct 11, 2017 at 7:50 PM

Skype [51]

Monex 247 \$3.20

vlad

All People Messages Groups

Quickly search for people, messages and groups.

PEOPLE

Vladimir S [redacted]
Chatted over a year ago

GROUP CHATS

IT ICOBOX TECH

ICOBOX - payment system

SKYPE DIRECTORY

Lada [redacted]
Skype Name matched
vlad
Por, Czech Republic

Vlad C [redacted]
2 mutual connections

Vlad S [redacted]
2 mutual connections
United States

MORE

Vladimir S [redacted]
Hello, friend? | Gallery | Find

address

0 / 0 Cancel

MQaGtj9jAREPurAzYtR6wnWicCpe8Y1NHc:
please confirm the last time?

Vladimir, 1:20 PM

Check address on TREZOR

MQaGtj9jAREPurAzYtR6wnWicCpe8Y1NHc
LTC Account #1

looks legit

1:22 PM

payment sent

i had to use coinpayments

confirmed email verification, now it is pending

2/10/2018 02:21:33pm 326.80100000 LTC Pending Address: MQaGtj9jAREPurAzYtR6wnWicCpe8Y1NHc:
Withdrawal ID: CWC81W0ECLJ7ZIIACJZREAT0PIJ
Note: ICOBOX PAYMENT, 326.8 LTC


Vladimir, 1:36 PM

got the funds
via Skype

Type a message


11:51 PM
8/11/2020

Transaction details



From Uphold User
7.0007 BTC

Network fee
0.00070 BTC



To Bitcoin network
7.00 BTC

Transaction

Reservechain transaction ID


Date

October 11, 2017, 8:46:44 PM

Blockchain transaction ID

Hash

Status

 Completed

Transaction created using Uphold

Back to Uphold

Transaction Details



Buy ▾

Presale ▾

Play ▾

Gaming ▾

Overview

State

</> API



Transaction Hash:

0xc915e2e3f3999a78d73f3e2bca2058deda2c518cc64c09640aee66356c869911

Block:

4359510 18841115 Block Confirmations

Timestamp:

2871 days ago (Oct-12-2017 02:55:40 PM UTC)

From:

0x2ecE33feB37CF1F1d36641cE936E07f7d9229EFC

To:

0xaDDba13aD0fa5D7A82b40763Aa02575CA60540c9

Value:

384.9997263399999683 ETH \$1,835,621.17

Transaction Fee:

0.000273 ETH \$1.30

Gas Price:

13 Gwei (0.000000013 ETH)

More Details:

[+ Click to show more](#)

Private Note:

To access the Private Note feature, you must be [Loaded In](#) This website [uses cookies to improve your experience](#). By continuing to use this website, you agree to its [Terms](#) and [Privacy Policy](#).

Got it!

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-7

Overview

JSON

TRANSACTION HASH

48abb2...9e6f 

BLOCK HASH

2b69ca...bbe0

SIZE

249

LOCK TIME

0

INPUTS

1

OUTPUTS

2

CONFIRMATIONS

1,531,487

WITNESS

Yes

INPUTS TOTAL VALUE

435.219 LTC (\$49,375.08)

OUTPUTS TOTAL VALUE

435.219 LTC (\$49,375.06)

INPUT ^

M8n6

435.

LTC

BlockExplorer.com




LITECOIN



OUTPUT 1

LQPTxg...py9p 

301.3 LTC (\$34,182.14)

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Data displayed is based on publicly available blockchain information.



Win 100 ETH

200ETH Free Spins

Win 8 BTC

Claim 5 BTC

Get 250K Coins

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BITCOIN > TRANSACTION d20920...cde62e



Bitcoin transaction

HASH

SegWit

d20920d2c1fa87a456e168bddb4c8fe37b39de3e36b337130f9a5af6c9cde62e



TRANSACTION STATUS

In block 519,487

Confirmations: 391,280

TIME

FEE

2,675 days ago

0.00000676 BTC · 0.059 USD

22 Apr 2018 22:56:55 UTC

2.7148594 sat/B · 4.0418536 sat/vB


[Additional info](#)

[Transaction events](#)



[dApp Gallery](#)

Main (3)

INPUT 0


3AeddiApbQLXDnYZMZeNpbETjNtLtc
X4CX 

AMOUNT

 5.39385078 BTC  ·
46,108 USD

OUTPUT 0


CHANGE

3Q3tKvZ4oME3LMpchNgQPXgre8AShc
dRVE 

AMOUNT

0.38884402 BTC  · 3,426 USD


OUTPUT 1

1PtzFRCUqnpS9a5Db5xSNvJADJMDu1
Maca 

AMOUNT

5.005 BTC  · 44,099 USD 

 There are no events of the following types: Omni Layer.

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dApp Gallery



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Explorers

Products

News



USD



ENG



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200ETH Free Spins

Win 8 BTC

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BITCOIN > TRANSACTION 877349...a5c0c6



Bitcoin transaction

HASH

SegWit

877349d8f53ae668045f0fa27e43a2ead135d2a3602ea2df6a481bb4
17a5c0c6



TRANSACTION STATUS

In block 519,495

Confirmations: 391,272

TIME

FEE

2,675 days ago

0.00000676 BTC · 0.06 USD

23 Apr 2018 00:51:10 UTC

2.7148594 sat/B · 4.0418536 sat/vB


[Additional info](#)

[Transaction events](#)



[dApp Gallery](#)

Main (3)

INPUT 0


38ZMtsW5mXCNRNAZBBpeVBRp5Fthdi
TKKR 

AMOUNT

 5.21926937 BTC  ·
41,630 USD

OUTPUT 0


CHANGE

352NpQYz9Jz7YqSqWpSmjmmoAF5api
PH5n 

AMOUNT

0.21926261 BTC  · 1,950 USD


OUTPUT 1

13cQi4FuhFy7J1eqnKV5NG3QU6jst
5gcN 

AMOUNT

5 BTC  · 44,485 USD 

 There are no events of the following types: Omni Layer.


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ATTACHMENT-8



Marcus Andrade <ceo@amlbitcoin.com>

Partnership

Marcus Andrade <ceo@amlbitcoin.com>

Sun, Apr 22, 2018 at 7:25 PM

To: Zübeyir [REDACTED]@ovis.com.tr>

Cc: listing <listing@ovis.com.tr>

Hello Team,

Invitation link below. Bot were git names were added.

I sent off 5 BTC,

<https://btc-bitcore6.trezor.io/tx/877349d8f53ae668045f0fa27e43a2ead135d2a3602ea2df6a481bb417a5c0c6>

I can either send you the balance in ETH within the next 24 hours, or when my partner gets back from china in 4 days, he can go into cold storage and send you the balance in BTC.

You should have everything you need to list. We have some big news coming next week.

Thanks Partners,

Marcus

Skype Monex247

[Quoted text hidden]

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-9

[Explorers](#)[Products](#)[News](#)

USD



ENG



Win 100 ETH

200ETH Free Spins

Win 8 BTC

Claim 5 BTC

Play for Free

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BITCOIN > TRANSACTION 2590e9...6ca96b



Bitcoin transaction

HASH

SegWit

2590e9c5ebd03017dd1960f69ba137abe92ad689c4d5ff4891e4ef38
de6ca96b



TRANSACTION STATUS

In block 515,064

Confirmations: 395,705

TIME

FEE

2,704 days ago

0.00000338 BTC · 0.029 USD


25 Mar 2018 07:12:33 UTC

1.352 sat/B · 2.0179104 sat/vB

[Additional info](#) [Transaction events](#)[dApp Gallery](#)

Main (3)

INPUT 0

3AzQHrqCdVU5br2RwbSynxMSeF99Yo
fvUh 

AMOUNT

< 10.13523846 BTC  ·
109,405 USD

OUTPUT 0

1AfhlKaQhk62KF6HAgAJdALvQM3jPR
b9HP 

AMOUNT

3.00000349 BTC  · 26,606 USD
>

OUTPUT 1

CHANGE

3Bqb3cT85Pxx7FrcK3uMkxQGFzFW3f
f9AN 

AMOUNT

7.13523159 BTC  · 63,281 USD
>

 There are no events of the following types: Omni Layer.

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dApp Gallery



Chat with 

Generate PDF Receipt

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ATTACHMENT-10



Marcus Andrade <ceo@amlbitcoin.com>

Partnership

Marcus Andrade <ceo@amlbitcoin.com>
To: Exrates <listing@exrates.top>

Sun, Mar 25, 2018 at 1:54 AM

Payment sent to wallet address 1AfhLKaQhk62KF6HAgAJdALvQM3jPRb9HP

Transaction

<https://btc-bitcore6.trezor.io/tx/2590e9c5ebd03017dd1960f69ba137abe92ad689c4d5ff4891e4ef38de6ca96b>

Please give me your Git Username so that I can send you the link to our github.

Thank you,

Marcus

[Quoted text hidden]

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-11



Explorers

Products

News



USD



ENG



Win 100 ETH

200ETH Free Spins

Win 8 BTC

Claim 5 BTC

Get 250K Coins

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BITCOIN > TRANSACTION 400635...a9df2f



Bitcoin transaction

HASH

SegWit

40063503fd8e2c45c619d91c377b55fcf1fb30d137cf13df671853c0
c0a9df2f



TRANSACTION STATUS

In block 515,582

Confirmations: 395,187

TIME

FEE

2,700 days ago

0.00000783 BTC · 0.062 USD

28 Mar 2018 20:19:16 UTC

1.8598574 sat/B · 3.0319458 sat/vB

[Additional info ^](#)

AMOUNT TRANSFERRED

17.2192772 BTC · 137,345 USD

SIZE

COINDAYS DESTROYED

421

369

WEIGHT

1,033

VIRTUAL SIZE

258 vB

COINBASE TRANSACTION

No

WITNESS DATA

Yes

RBF ENABLED

No

LOCK TIME

0

VERSION

1

Transaction events

dApp Gallery

Main (4)

INPUT 0

3Bqb3cT85Pxx7FrcK3uMkxQGFzFW3f
f9AN 

AMOUNT

< 7.13523159 BTC ✓ ·
63,281 USD

OUTPUT 0

CHANGE

38ZMtsW5mXCNRNAZBBpeVBRp5Fthdi
TKKR 

AMOUNT

5.21926937 BTC ✓ · 41,630 USD
>


INPUT 1

3A9kht3RtWNndjwpcZZS8sJWceyKgE
23aU 

AMOUNT

< 10.08404561 BTC ✓ ·
108,852 USD

OUTPUT 1

19R9bMYpJpkuLEwNsMfr2TftUi3aTH
WiRQ 

AMOUNT

12 BTC ✓ · 95,715 USD >

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-12



JPMorgan Chase Bank, N.A.
P O Box 182051
Columbus, OH 43218-2051

May 01, 2018 through May 31, 2018
Account Number: [REDACTED] 8602

CUSTOMER SERVICE INFORMATION

Web site: www.Chase.com
Service Center: 1-877-425-8100
Deaf and Hard of Hearing: 1-800-242-7383
Para Espanol: 1-888-622-4273
International Calls: 1-713-252-1679

00024553 DRE 703 141 15218 NNNNNNNNNN T 1 000000000 54 0000

BLOCK BITS CAPITAL, LLC

SPOKANE WA [REDACTED]



We updated our Deposit Account & Wire Agreements

The following changes were made May 20, 2018:

- We published an updated version of our Deposit Account Agreement. You can get the latest agreement at a branch or by request when you call us. Here are some important changes:
 - Effective August 1, we will notify you in advance of any changes to the Deposit Account Agreement that would adversely affect you, unless the change is necessary to comply with a legal requirement. (General Account Terms, Section I, Changes to the agreement)
 - We clarified the language that explains when we may charge a Non-Chase ATM fee for balance inquiries and transfers when you use a non-Chase ATM. (Electronic Funds Transfer Service Terms, Section A, Types of EFT Services)
- We consolidated all of our Chase wire agreements, except for the Online Wire Agreement. In addition to making sure the terms and definitions of the Wire Transfer Agreement are consistent, we made the following changes:
 - When we amend the agreement, we will send you notice of the change and may refer you to a branch or your banker for the updated agreement.
 - When you send a wire, we will send you an email notification on the status of your wire if you have provided your email address.

Please call us at the number on this statement if you have any questions.

CHECKING SUMMARY

Chase Platinum Business Checking

	INSTANCES	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	1	[REDACTED]
[REDACTED]	1	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Your account ending in 5836 is linked to this account for overdraft protection.



May 01, 2018 through May 31, 2018
Account Number: [REDACTED] 8602

Your Chase Platinum Business Checking account provides:

- No transaction fees for unlimited electronic deposits (including ACH, ATM, wire, Chase Quick Deposit)
- 500 debits and non-electronic deposits (those made via check or cash in branches) per statement cycle
- \$25,000 in cash deposits per statement cycle
- Unlimited return deposited items with no fee

There are additional fee waivers and benefits associated with your account – please refer to your Deposit Account Agreement for more information.

DEPOSITS AND ADDITIONS

DATE	DESCRIPTION	AMOUNT
05/09	Online Transfer From Chk ...5637 Transaction#: 7133426476	223,461.00
Total Deposits and Additions		

ELECTRONIC WITHDRAWALS

DATE	DESCRIPTION	AMOUNT
05/09	05/09 Domestic Wire Transfer Via: Wells Fargo NA/121000248 A/C: Nac Payroll Services, Inc Ref/Time/14:53 Imad: 0509B1Qgc03C007474 Trn: 4939900129Es	\$235,261.00
Total Electronic Withdrawals		\$235,261.00

[REDACTED]
 [REDACTED]
 [REDACTED] AMOUNT
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SERVICE CHARGE SUMMARY	
1	Service Charge Summary
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100	Service Charge Summary

Will be assessed on 6/1/18

You were assessed a monthly service fee on your Chase Platinum Business Checking account because you did not maintain the required relationship balance.

SERVICE CHARGE DETAIL

DESCRIPTION	QUANTITY	UNIT PRICE	TOTAL PRICE	TAX	TOTAL
[REDACTED]	1				
[REDACTED]	3		0		
[REDACTED]	1	4	0		
[REDACTED]	1	0	1		
					\$95.00

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JPMorgan Chase Bank, N.A.
P.O. Box 182051
Columbus, OH 43218-2051

June 01, 2018 through June 29, 2018

Account Number: [REDACTED] 8602

CUSTOMER SERVICE INFORMATION

Web site: www.Chase.com
Service Center: 1-877-425-8100
Deaf and Hard of Hearing: 1-800-242-7383
Para Espanol: 1-888-622-4273
International Calls: 1-713-252-1679

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BLOCK BITS CAPITAL, LLC

SPOKANE WA [REDACTED]



CHECKING SUMMARY

Chase Platinum Business Checking

	INSTANCES	AMOUNT
Beginning Balance		
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Your account ending in 5636 is linked to this account for overdraft protection.

Your Chase Platinum Business Checking account provides:

- No transaction fees for unlimited electronic deposits (including ACH, ATM, wire, Chase Quick Deposit)
- 500 debits and non-electronic deposits (those made via check or cash in branches) per statement cycle
- \$25,000 in cash deposits per statement cycle
- Unlimited return deposited items with no fee

There are additional fee waivers and benefits associated with your account – please refer to your Deposit Account Agreement for more information.

DEPOSITS AND ADDITIONS

DATE	DESCRIPTION	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]
06/19	Online Transfer From Chk ...5637 Transaction#: 7243223288	234,300.00
Total Deposits and Additions		\$235,000.00

ATM & DEBIT CARD WITHDRAWALS

DATE	DESCRIPTION	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

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USAO 0018364

IRS-GJ-0018810

June 01, 2018 through June 29, 2018
Account Number: [REDACTED] 8602

ATM & DEBIT CARD WITHDRAWALS		(continued)
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[illegible]



JPMorgan Chase Bank, N.A.
P O Box 182051
Columbus, OH 43218-2051

June 30, 2018 through July 31, 2018

Account Number: [REDACTED] 8602

CUSTOMER SERVICE INFORMATION

Web site: www.Chase.com

Service Center: 1-877-425-8100

Deaf and Hard of Hearing: 1-800-242-7383

Para Español: 1-888-622-4273

International Calls: 1-713-262-1679

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BLOCK BITS CAPITAL, LLC



CHECKING SUMMARY

Chase Platinum Business Checking

	INSTANCES	AMOUNT
Beginning Balance		
[REDACTED]	1	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	1	
[REDACTED]		
[REDACTED]	[REDACTED]	
	<hr/>	
	[REDACTED]	

Your account ending in 5836 is linked to this account for overdraft protection.

Your Chase Platinum Business Checking account provides:

- No transaction fees for unlimited electronic deposits (including ACH, ATM, wire, Chase Quick Deposit)
- 500 debits and non-electronic deposits (those made via check or cash in branches) per statement cycle
- \$25,000 in cash deposits per statement cycle
- Unlimited return deposited items with no fee

There are additional fee waivers and benefits associated with your account – please refer to your Deposit Account Agreement for more information.

DEPOSITS AND ADDITIONS

DATE	DESCRIPTION	AMOUNT
07/20	Coinbase Com/Btc 8889087930 PPD ID: 1455293997	\$324,511.53
Total Deposits and Additions		\$324,511.53

ATM: DEBIT CARD WITHDRAWAL

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]



June 30, 2018 through July 31, 2018
Account Number: [REDACTED] 8602

ATM & DEBIT CARD WITHDRAWALS (continued)

DATE	DESCRIPTION	
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

ELECTRONIC WITHDRAWALS

DATE	DESCRIPTION	
[REDACTED]	[REDACTED]	[REDACTED]
07/20	07/20 Domestic Wire Transfer Via: Wells Fargo NA/121000248 A/C: Nac Payroll Services, Inc Ref:/Time/15:33 Imad: 0720B1Qgc08C028821 Tr: 5377600201Es	312,314.18
[REDACTED]	[REDACTED]	[REDACTED]
Total Electronic Withdrawals		[REDACTED]

[REDACTED]	[REDACTED]	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

FEES

DATE	DESCRIPTION	AMOUNT
[REDACTED]	[REDACTED]	\$ [REDACTED]
Total Fees		[REDACTED]

DAILY ENDING BALANCE

DATE	AMOUNT
07/02	\$7,761.59
07/05	6,476.02
07/09	6,433.96

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USAO 0018369

IRS-GJ-0018815

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-13

From: David Mata <[REDACTED]@blockbits.capital>
To: Wynar, Roahn (SF) (FBI)
Cc: Japheth Dillman
Subject: Re: BTC, LTC, and ETH transactions.

Let me know if you have e any questions on it, ipulled those links from emails he sent me, I could forward those direct.
David Mata

Managing Director and Co-Founder

Block Bits Capital

[REDACTED]

[REDACTED]@blockbits.capital

On Mon, Sep 24, 2018, 17:37 Wynar, Roahn (SF) (FBI) <[REDACTED]> wrote:
Excellent. I'll get right on this.

-

----- Original message -----

From: David Mata <[REDACTED]@blockbits.capital>
Date: 9/24/18 4:15 PM (GMT-08:00)
To: "Wynar, Roahn (SF) (FBI)" <[REDACTED]>, Japheth Dillman
[REDACTED]@blockbits.capital>
Subject: BTC, LTC, and ETH transactions.

Hi Roahn,
As per our call last week, I wanted to give you some transactions to look at.

This is a BTC transfer from Marcus:

<https://btc-explorer.trezor.io/tx/8c32ae4145d9e675cf7b2e7b498b671f7591d9050d1d4ff3173dee05d932d237>

<https://bitcoinwhoswho.com/address/3NmdLMyxjLmiWugpWGhjPsfpdZJ9cTet71>

Our wallet at Coinbase was the receiving one ending in Tet71

LTC Transfer:

<https://ltc-explorer.trezor.io/tx/69f81bcc3ed539029b1974ff2a85c273682c1a893d661763a7d1301238e4094f>

<https://ltc-explorer.trezor.io/tx/e2f662ec3c4cb0f66f05b37668b8b0e8edc69808e58fb9c8d01211f54004be87>

Our LTC wallet at Coinbase was ending in weqjs6

BCH transfer:

<https://bitcoincash.blockexplorer.com/tx/111f69e70f05951651262a648278c0e3565ac1288567136842755>

97884f3202a

<https://bitcoincash.blockexplorer.com/tx/c8855ab6338e27b02d806227d62ff35dc56109fa90f34455b71906924cab412e>

Our BCH wallet at Coinbase is ending in fvddk

This was from the last time we liquidated crypto for him, Jul 18th, 2018. The results were wired to his NAC Payroll Services, Inc. account.

I'll look for other liquidation info, if this helps.
D

--

David Mata
Managing Director and Co-Founder
Block Bits Capital

[REDACTED]
[REDACTED]@blockbits.capital

* Please consider this message confidential and not to be shared with anyone outside of the recipient list.

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-14

FEDERAL BUREAU OF INVESTIGATION

Date of entry 09/27/2018

On September 24, 2018 David Mata, previously interviewed, sent SA Wynar an email which has been attached to this report. That email contained the cryptocurrency transaction ID's used by Andrade to deliver cryptocurrency to Mata and Japheth Dillman. The relevant transaction numbers were:

64 ETH (Ethereum):

0x37f2c12f6a49979ca7a9f69269ff256cfe31c785135d2d2177d0fcf4db1fae
20

144.8 ETH:

0xd8f3db23b04a5f8c502ef6895669cb07235c2ac54267f614ba66dbbabf98
47df

114 ETH:

0x4388c709ad1a5fc15a87af35c2bad24364f16060e16b99305bc140a916e4
c781

After Mata and Dillman converted Andrade's Ethereum to U.S. dollars the money was wired to:

NAC Payroll Services, Inc.

Account Number: [REDACTED] 9155

Bank: Wells Fargo Bank, NA

Address: 420 Montgomery Street, San Francisco, CA 94104

Routing Number: [REDACTED]

SWIFT: [REDACTED]

NAC PAYROLL SERVICES address

[REDACTED] Texas 77459

Investigation on 09/26/2018 at San Francisco, California, United States (Email)

File # 58D-SF-2113481-302

Date drafted 09/26/2018

by ROAHN WYNAR

United States v. Andrade

Defendant's Brief on Forfeiture and Restitution Objections

ATTACHMENT-15

FEDERAL BUREAU OF INVESTIGATION

Date of entry 02/12/2020

David Mata was interviewed at in the lobby of the The Davenport Tower Hotel, located at 111 S. Post Street, Spokane, Washington. Mata was aware of the interviewers identities from prior interactions. The meeting was covertly recorded, [REDACTED]

[REDACTED] A summary of the interview is documented below:

Mata was responsible for managing the crypto-currency in the possession of Block Bits Capital. [REDACTED] on or about May 2018.

[REDACTED] Marcus Andrade needed to get a large quantity of Ethereum cleared within the next hour. [REDACTED]

[REDACTED] Mata subtracted a service fee from the difference. [REDACTED]

Mata recalled the vast majority being Ethereum, but there may have been some Bitcoin.

Investigation on 08/26/2019 at Spokane, Washington, United States (In Person)File # 58D-SF-2113481-302Date drafted 12/30/2019by Ethan A. Quinn, ROAHN WYNAR